

REMARKS

Applicants thank the Examiner for participating in the interviews conducted over the telephone on February 1 and 15, 2007. A proposed amendment of the claims was discussed, as was the prior art of record. The Examiner suggested a further clarification of the amendment. It was agreed that, after these amendments, the claims are not anticipated or suggested by the reference relied on in the office action.

In the office action dated December 18, 2006, all pending claims 1-20, 22-33, 35-46, 48-58, 60-70 and 72-75 were rejected. Applicants are amending all of the pending independent claims, which are claims 1, 14, 27, 40, 52 and 64. As such, claims 1-20, 22-33, 35-46, 48-58, 60-70 and 72-75 remain pending. Favorable consideration of the claims as amended is requested.

Claim 1 is being amended to recite that, in response to the input, at least one implicit data source is searched and that the implicit data source is not originally created for establishing the dynamic target group. The implicit data source is searched to determine if information therein matches the defined attribute(s) and, if a match is determined, the information is used to identify individuals of the dynamic target group. These amendments are supported by the present disclosure, for example on page 16, paragraph 0053 (hereafter referred to thus: 16:0053). There, it is described that 50 emails mentioning a particular topic written by a software engineer in a short time frame can be used to infer implicit membership of this employee to the group of employees with a professional interest in that topic. 16:0053. Particularly, the example explains that the implicit data source contains "information that infers, but does not directly state, interest, expertise or responsibility of an individual regarding a certain subject." 16:0053. There is no indication in the description that these emails were sent for the purpose of becoming a member of a target group focusing on the topic at issue. Rather, the emails appear to have been sent because the person has an "interest ... regarding a certain subject" as the example explains. 16:0053. Accordingly, these 50 emails are an example of an implicit data source that was not originally created for establishing a target group. Moreover, the specification describes that the human capital information mining module 25 can search one or more implicit data sources

according to the defined attributes. 20:0066. The specification also describes that individuals of the target group are identified if there is a match in the searching, because it says that the knowledge group identification module 30 “use[s] the common attributes to identify a group having those attributes”, 14:0048, and particularly that the interpretation module 34b “returns ... a list of people satisfying the user request”, 15:0050. Some or all of the above changes, as applicable, are also made in the other independent claims 14, 27, 40, 52 and 64. No new matter is added by the amendments.

All pending claims were rejected under § 102(e) as being anticipated by U.S. 6,480,885 (“Olivier”). This rejection is rendered moot by the present amendments of the claims, but Applicants are not conceding the correctness of the rejection. Moreover, the Examiner agreed in the interview that with the present amendments of the claims, including the amendment proposed by the Examiner, the claims are no longer anticipated or suggested by Olivier. As such, Applicants request favorable consideration of the present claims as amended.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

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This amendment is filed with a Request for Continued Prosecution and no fee is therefore due. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

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